

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY DALE, BRETT JACKSON,
JOHNNA FOX, BENJAMIN
BORROWMAN, ANN LAMBERT,
ROBERT ANDERSON, and CHAD
HOHENBERY on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

DEUTSCHE TELEKOM AG, T-MOBILE
US, INC., and SOFTBANK GROUP
CORP.,

Defendants.

Case No. 1:22-cv-3189

Hon. Thomas M. Durkin

**DEFENDANT SOFTBANK GROUP CORP.'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE**

Defendant SoftBank Group Corp. ("SBG") respectfully moves the Court for an order dismissing it for lack of personal jurisdiction and improper venue, pursuant to Rule 12(b)(2) and 12(b)(3) of the Federal Rules of Civil Procedure.

As grounds for this motion, SBG contends that Plaintiffs cannot establish both this Court's personal jurisdiction over SBG and proper venue in this District, as needed for this case to proceed against SBG. This Court cannot exercise personal jurisdiction over SBG based on its contacts with Illinois because SBG does not have jurisdictional contacts sufficient to satisfy the Due Process Clause of the Fourteenth Amendment. Alternatively, this judicial district is an improper venue for an antitrust suit where personal jurisdiction is based on SBG's nationwide contacts with

the United States. SBG does not inhabit, cannot be found, and does not transact business within the Northern District of Illinois, as required under 15 U.S.C. § 22.

In support of its motion, SBG submits an accompanying memorandum of law and the declaration of Mamoru Fujimura.

Dated: December 5, 2022

Respectfully submitted,

/s/ Rachel S. Morse

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